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REMARKS

Claims 1-18, 20-26, and 28-30 are pending in the application. Claims 20-26 stand withdrawn from consideration as being drawn to a non-elected invention.

EXAMINER INTERVIEW

Examiner Gerald Gauthier is thanked for the time and courtesy extended during the telephone interview had with the undersigned on May 18, 2004. The Examiner indicated that claims may be read broadly enough so as to encompass programming of the local instrument by a telephone company central office. The Examiner indicated that an amendment submitted by way of a formal response further clarifying the relationship between the central programming controller and the local instrument would be considered.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 11-16 and 18 stand rejected under 35 U.S.C. § 103 as being unpatentable over Brennan et al. (U.S. Patent No. 4,788,720) in view of Zhu (U.S. Patent No. 6,240,172). Claims 1-10 and 28-30 stand rejected under 35 U.S.C. § 103 as being unpatentable over Brennan et al. In view of Zhu, both supra, and in further view of LeDuc et al. (U.S. Patent No. 5,355,404). The rejections are traversed as follows.

The method of claims 1-10, 29, and 30 provides program mapping of telecommunication system features in a telecommunication system to buttons of a local instrument, wherein the mapping is accomplished by a user at a local instrument through the use of user prompting via, beeps, buzzes, and voice prompts provided by the central controller receiving user input in response to said at least one audible prompt. The mapping is stored in a memory of the central programming controller in response to the user input. The claims have been further clarified by this Amendment to recite the central programming controller connecting the local instruments to an outside telephone company.

Likewise, the apparatus of claim 28 calls for mapping a selected telecommunications system feature using user input at a local instrument through the use of user prompting via beeps, buzzes, and/or voice prompts provided by

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the central controller receiving user input in response to the audible prompt. The mapping is stored in a memory of the central programming controller in response to the user input. Claim 28 has been clarified by this Amendment to recite the central programming controller connecting the local instruments to an outside telephone company.

Claims 11-18 all require program mapping selected ones of PBX system features to selected buttons on a telephone receiver using voice prompts provided to a user at the telephone receiver. The claims have been clarified by this Amendment to recite the central programming controller connecting the local instruments to an outside telephone company.

The Claims Distinguish Patentably over the Cited Prior Art

Brennan et al. disclose a programmable telephone ("set") for implementing a plurality of special features such as hold, call transfer, call forward, etc. The set is comprised of a microprocessor and electronic telephone circuit connected to a plurality of programmable function keys, for generating one or more Centrex or PBX special feature access code signals in response to depression of predetermined ones of the keys. The special feature access code signals are programmed directly into the RAM (200) of the local instrument such that the set may be used with a variety of PABX and Centrex facilities in lieu of expensive proprietary subscriber sets or awkward and difficult to use standard type 2500 sets. Thus, the system of Brennan et al. requires programming the special feature access codes for a particular PBX or Centrex system directly into the set. See, e.g., column 2, lines 24-30; column 3, lines 5-10; column 3, lines 67-68, column 4, lines 15-16; column 11, lines 1-4, and so forth.

In contrast, the present claims require that the telecommunication features be stored in a central controller of a type connecting the local instruments to an outside telephone system <u>wherein the features are mapped in a memory of the central controller</u> to a particular key on a local instrument.

As the Examiner correctly acknowledges in the final Office action, the Brennan et al. reference does not disclose or otherwise suggest storing the recited feature of mapping data in the central programming controller.

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Neither the Zhu reference nor the LeDuc et al. reference cure this basic deficiency of the Brennan et al. reference.

The Zhu reference discloses a system wherein a special purpose program corresponding to a special feature is physically stored in electrically erasable programmable read only memory (EEPROM) of the telephone set. This allows a user to remotely reconfigure a feature-function telephone via a voice prompt system contained at a central office of the telephone company. Like Brennan et al., Zhu discloses only that the special feature program is physically transmitted to the user's telephone set. See column 5, lines 37-40. This is direct programming of the telephone set, and not a mapping as is expressly required by the present claims. There is nothing in the Zhu reference to disclose the claimed invention wherein the switch on the local instrument is simply mapped to a special feature in a central program controller. In the system of Zhu, the special access programming code for the desired feature must be physically stored in the telephone set itself.

To the extent that the Examiner considers the recited central programming controller to read on the telephone company central office, the present amendment clarifies that the central controller storing the data mapping of the local instrument switches connects the local instruments to the outside telephone company. By contrast, Zhu discloses only a telephone connected directly to the telephone company central office.

The Examiner additionally relies on LeDuc et al. LeDuc et al. disclose a method for use by a switching system in controlling the rate of downloading of parameters to customer stations. The method of LeDuc et al. addresses the problem of downloading to the stations of an entire configuration group in uncontrolled fashion, which would interfere with the switching system processing of telephone calls. To address this problem, LeDuc et al. propose performing such downloading at a controlled rate thereby limiting any reduction in call processing due to the parameter downloading.

Thus, the LeDuc et al. reference does not cure the basic deficiency of the Brennan et al. and Zhu references in that LeDuc et al. teach only the

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physical downloading of parameters to the local instruments. See LeDuc et al., Abstract at line 2. There is no teaching or suggestion of any mapped relationship between a switch on a local instrument and a special feature within the central controller, as required by the present claims.

Thus, all of the cited references disclose physically storing the special feature access codes in the local telephone set. None of the cited references disclose program mapping data contained within a central controller which simply maps a particular key of a local instrument to the special feature programming in a central controller connecting the local instruments to an outside telephone network, as called for by the present claims.

As stated above, the Examiner correctly acknowledges that Brennan et al. fail to disclose the recited mapping limitation of the present claims, but asserts that this claim limitation is found in LeDuc et al. at column 4, lines 33-41. The cited portion is reproduced below:

> Switching system 1000 stores data for each served customer station defining its active/inactive status and whether calls to the station are blocked due to a craft-initiated removal of the station from service. A customer station may be inactive because the station is unplugged, power is removed, the station is not initialized, or because of a failure of the physical, link, or network levels of communication between the customer station and switching system 1000.

Thus, the cited portion is directed only to storing data which defines the telephone station status as active or inactive. This does not disclose or suggest storing telephone feature mapping data.

It is well established that, to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 180 U.S.P.Q. 580 (C.C.P.A. 1974). See also In re Wilson, 165 U.S.P.Q. 494 (C.C.P.A. 1970). As set forth above, Brennan et al., Zhu, and LeDuc et al. teach only physically storing special feature access codes or programming in a memory of a telephone set. All of the cited references fail to teach or suggest mapping specific keys to selected features in a central controller wherein the central controller connects the local instruments to an

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outside telephone network. The only data storage in the cited prior art is that active/inactive status of the telephone station, that is, whether a station is inactive, for example, due to a phone being blocked from service, unplugged, network failure, etc.

Because the cited references taken alone and in combination fail to teach or otherwise suggest each and every claim element, it is respectfully submitted that a prima facie case of obviousness has not been established. Withdrawal of the rejections under 35 U.S.C. § 103 is, therefore, respectfully requested.

CONCLUSION

Applicant again wishes to thank the Examiner for the above-mentioned telephonic interview during which the proposed amendment was discussed and upon which the presently filed Amendment is based. It is believed that the present amendment addresses the Examiner's concerns raised during the interview and it is believed that the case is now in condition for allowance and early notice to that effect is earnestly solicited. Should the Examiner have any further concerns or questions, he may contact the undersigned at the telephone number below.

Respectfully submitted,

May 18, 2004

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